From:	[redacted]
To:	Billington, Tracie; scouch@waterboards.ca.gov;
CC:	
Subject:	We Adamantly Oppose the Sacramento Valley Integrated Regional Water Management Plan
Date:	Wednesday, November 22, 2006 12:34:47 PM
Attachments:	

Please accept our comments regarding our staunch opposition to the proposed Integrated Regional Water Management Plan and the Implementation Grant.

We have a great many concerns, partly regarding the process and partly regarding the project and grant proposals. This review process is foolishly short-sighted.

1. This very long-term plan is being rushed through the review and approval process with minimal public involvement and extremely limited scientific analysis.

2. This process is being driven by Northern California Water Association and associated water contractors. To claim that this is an informed grassroots effort is ludicrous. There is no public interest or benefit behind it or intimately involved in the decision making process. Only the most perfunctory public announcements, dissemination of information, and public discussions have occurred. The public and local entities have been, essentially, excluded.

3. All North Valley water users (residential, agricultural, industrial, etc.) must be made intimately and thoroughly aware of and consulted in this process from beginning to end, rather than being excluded from formulation of the plans and most of the decision making process so far. The affected public must be widely informed about the science (and lack of science to date) involved in these decisions, and the risks and potential consequences for all of us. There must be in-depth public discussion and participation in every potentially affected community and before every affected elected body.

4. Independent and much more thorough scientific knowledge and analysis are crucial, before any further consideration of options, plans, and grants. It is particularly essential to fully understand the sources, rates of flow, and effects of varied rates of recharge and extraction over time, for both surface and groundwater. It is already known that groundwater levels in many areas of Butte County have been drawn down steadily since the late 1990s from

recent rates of pumping, in spite of normal precipitation, even without the proposed additional pumping.

5. It is also known, from the experience of other areas, that groundwater drawdown adversely and permanently impacts agricultural operations, riparian and seasonal wetlands, oak woodlands, and other natural habitats and the thousands of species dependent upon them. This and the flooding of riparian and vernal pool habitats for storage in other locations is unacceptable. Until you fully understand current conditions, the potential impacts of this proposal on all water users and natural habitats, and the added risks of prolonged drought on all of the above, these decisions are premature and irresponsible.

6. According to the best estimates of the National Oceanic and Atmospheric Administration and the broad scientific community, the Western United States is almost certainly about to enter a very lengthy period of severe drought, including much diminished snowpack in the Sierra Nevada, as a result of global warming and a semi-permanent El Nino effect. None of this has yet been taken into account in this planning.

7. You must fully examine the long-range effects of repeatedly drawing down groundwater and attempting to recharge it from surface flows. It has been demonstrated repeatedly that settling of subsurface strata occurs when water is withdrawn, resulting in reduction of storage spaces and inability to fully recharge. Thus, over-reliance on groundwater pumping is likely to permanently deplete the carrying capacity of this resource.

8. When such a long-term commitment regarding a critical environmental asset poses any potential risk of serious harm - no matter how small that risk may initially seem - prudent decisions necessitate the most advanced scientific analysis, subjected to thorough public scrutiny. Otherwise, the outcome may prove to be disastrous over time. To act hastily, without such knowledge, is Russian roulette, with all of our lives at stake. If ever there was a situation demanding the use of the “Precautionary Principle,” this is it. Please “Google” search that phrase and you will understand our meaning.

9. Monitoring the health of the aquifer offers little or no assurance, because there is no way to reverse permanent diminishment of ground water storage capacity from subsidence and species extinctions from surface water diminishment. Without understanding recharge rates in times of drought and the other unknown hydrologic processes, no clear conclusions can be derived from the results of monitoring, no clear response to those results will

be possible, and modifications to the program may be ineffective, inappropriate, or too late. Monitoring offers scant assurance, for it may accomplish nothing.

10. We insist upon full and timely compliance with all state and federal environmental laws, including a full EIR and EIS on all aspects of this project and grant before commitments or decisions are made. To do otherwise is certain to jeopardize not only the environment, but the project itself, for court delays and court orders will surely result in full environmental analysis in the end, with much more delay and expense. Included in this analysis must be the full analysis of hydrological conditions and processes, as discussed above. In other words, a thorough scientific study and environmental analysis must proceed together, before any further steps are taken in this approval process.

11. The ownership of subsurface water rights, following drawdown and recharge from surface sources, presents other serious issues and uncertainties. In other locations, prior groundwater ownership rights have been diminished or terminated when the groundwater previously owned by the surface landowners was replaced by surface water pumped into the ground. This potential must be thoroughly understood and considered by the current owners of groundwater rights, as well as the entities representing them in these transfers.

12. The most readily available, least costly, and most environmentally benign new source of water in California is conservation and reuse. Excessive water use can and must be curtailed, throughout the state, in urban and rural, domestic and agricultural, business and industrial uses. The vast majority of water currently discarded as “waste” after a single use can be used repeatedly in closed loop systems for domestic, agricultural, industrial and other uses, if properly managed. This has the potential to not only produce an overabundance of available water, but an abundance of new employment and economic wealth for our state. The technology is readily available. This option should be followed to the full extent of its potential before further extraction and export are even considered.

13. Moreover, per capita water use in California is expected to decline significantly, dramatically reducing the need for this project. The benefits of this project and grant to these few proponents must be weighed against complete scientific evidence, environmental analysis, and adverse impacts on all other water users. Unless the benefits clearly outweigh the adverse impacts and risks, this project must not further proceed.

Jon and Tanha Luvaas, [redacted]

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